

July 15, 2021

**MEMO ENDORSED**

*Document Electronically Filed*

Hon. Barbara C. Moses  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

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Re: Figueroa v. Commissioner of Social Security  
Civil Action No: 1:20-cv-07649-BCM

Dear Judge Moses:

This letter respectfully requests an extension of time of forty-eight (48) days for Plaintiff to serve her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on July 21, 2021. Due to the unexpected loss of two briefing attorneys last week, our office is unable to complete a proper, meritorious brief by the current due date. This extension is needed to thoroughly and properly prepare Plaintiff's Motion.

Plaintiff's counsel has contacted defense counsel who consents to this request. This request would be Plaintiff's second extension in this matter.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on September 7, 2021. Subsequently, in accordance with the pattern of the Scheduling Order, the Commissioner's response to the Motion for Judgement on the Pleadings would then be due November 8, 2021. Plaintiff's Reply would then be due December 10, 2021.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky  
Howard D. Olinsky, Esq.  
Bar Code H06529  
Counsel for Plaintiff

CC [via ECF]: Joseph Pantoja (Counsel for Defendant)

Application GRANTED. No further extensions of plaintiff's motion deadline will be granted. SO ORDERED.

Dated: July 16, 2021  
New York, NY

  
**Honorable Barbara C. Moses**  
**U.S. Magistrate Judge**